

May 24, 2021

MEMO ENDORSED

VIA ECF

Hon. Sidney H. Stein
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Defendant's request to modify his conditions of bail as set forth below is granted.

**Dated: New York, New York
May 25, 2021**

SO ORDERED:


Sidney H. Stein, U.S.D.J.

Re: *United States v. Chimbo et al., (Junior Vladimir Jimenez-Castillo),*
19 Cr. 570 (SHS)

Dear Judge Stein:

I respectfully write on behalf of defendant Junior Jimenez-Castillo ("Mr. Jimenez") to request that the Court modify the terms of Mr. Jimenez's bail. Since September 2020, Mr. Jimenez has been subject to home detention and electronic monitoring, as well as other conditions. Mr. Jimenez has been in full compliance with all Court-mandated conditions of release and all instructions of the Pretrial Services Office for the entire period, which now is nearly nine months. It is respectfully requested that the Court no longer impose the condition of home detention, but instead impose a curfew condition with the hours to be set at the discretion of the Pretrial Service Office.

I have conferred with the government and with Pretrial Services and have been informed by AUSA Nicholas Chiuchiolo and Pretrial Services Office Jonathan Lettieri that the government and Pretrial Services have no objection to Mr. Jimenez's proposed bail modification of eliminating home detention and imposing a curfew with the hours to be set at the discretion of the Pretrial Service Office. The parties agree that electronic location monitoring should stay in place.

Respectfully submitted,

/S/
Sean M. Maher
Counsel for Junior Vladimir Jimenez-Castillo

cc: all counsel via ECF